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Department of Water Resources
Adjudication Bureau

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OFFICE OF THE
ATTORNEY GENERAL

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11-3

Objector:

Lola Coates and San Felipe Ranches

Attorney Name and Address:

34-2528

HEPWORTH, LEZAMIZ & HOHNHORST,
CHARTERED
133 Shoshone St. North
P.O. Box 389
Twin Falls, ID 83303-0389
Telephone: (208)734-7510

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA

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)

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)

)

Case No. 39576

AFFIDAVIT OF ROSS GODDARD

Subcase Nos.

SEE ATTACHED EXHIBIT "B"

STATE OF IDAHO

)

) ss.

County of Custer

)

Ross Goddard, being first duly sworn upon oath, deposes and says:

1. My name is Ross Goddard and I reside on Barton Flat, north of Mackay,
Idaho.

2. I make the following statements based upon my personal knowledge and beliefs, and I am otherwise competent to testify about these matters. In the Snake River Basin Adjudication, I filed objections to several United States Bureau of Land Management claims for stockwater and wildlife rights located in the Big Lost River drainage. Attached to this affidavit and incorporated into it is Exhibit A, which lists the rights I objected to.

3. I understand that Lola Coates and San Felipe Ranches are attempting to file late objections to some of the BLM claims. I support the Coates and San Felipe Ranches in their attempts because I believe the claims are not legitimate, but will be awarded by the court unless Mrs. Coates and San Felipe are allowed to object.

4. While I have removed my objections to the BLM claims, I did not withdraw those objections because I thought the rights were valid.

5. From the time that I objected until the present, I have always believed that the BLM has no basis to make those claims. When I discovered the BLM claims, the time limit to object was nearly expired. I was informed of the legal procedure in which to file the objections. I followed those procedures. I feel that I did everything according to procedure to bring to the attention of the Court, the BLM, and IDWR that there was elements of concern which needed to be addressed. After three years of paperwork, numerous meetings, special BLM negotiations and phone calls, it became evident that to pursue any further would be cost-prohibitive. I was informed that to proceed any further would require an attorney to represent Bar 13's interests. I was further harassed by BLM agents and attorneys to drop my objections. Numerous phone calls were made to me early in the morning and late at night by those people inquiring if I had reached a decision to

withdraw my objections. The costs, both financial and time-wise became too great to continue.

6. I do not believe that it would prejudice me or the BLM to allow the Coates and San Felipe to object. The BLM has informed me that they completely researched their claims and were certain of their position. If that is true, I do not see how it would cost them any more money or time except the time involving in showing their position to the court. It is my understanding the court must review the legal and factual basis for the claim even if the objections are withdrawn.

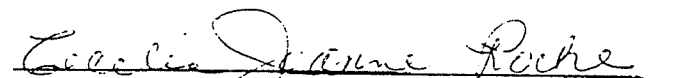
7. Further your affiant sayeth not.

Dated this 31 day of October, 1995.



Ross Goddard
Goddard Bar 13 Ranch

SUBSCRIBED and SWORN to before me this 31 day of October, 1995.


NOTARY PUBLIC FOR IDAHO
Residing at: Trackway Drive 8325
My Commission Expires: 3-11-98

(WATER\SF\41040AFF.RG)\lm

EXHIBIT "A"

34-13007A
34-13008A
34-13021A
34-13367
34-13387
34-13390

EXHIBIT "B"

34-02528	34-13087A	34-13147A	34-13207A
34-07444	34-13088A	34-13148A	34-13208A
34-07445	34-13090A	34-13154A	34-13209A
34-07447	34-13091A	34-13155A	34-13210A
34-07449	34-13095A	34-13157A	34-13211A
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CERTIFICATE OF SERVICE

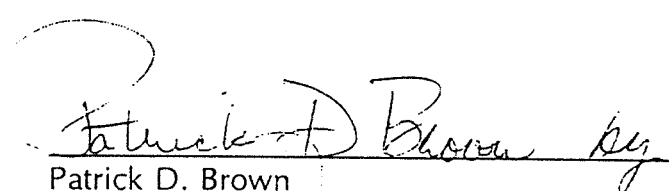
The undersigned, a resident attorney of the State of Idaho, with offices at 133 Shoshone St. North, P.O. Box 389, Twin Falls, Idaho 83303, and one of the attorneys for the objector in this matter, certifies that on the 3rd day of November, 1995, he served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Attorney General's Office
IDWR
P. O. Box 44449
Boise, ID 83711-4449

☒ U.S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Telecopy (Fax)

U.S. Department of Justice
Environment & Natural Resources
Division
550 West Fort St.
MSC 033
Boise, ID 83724

☒ U.S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Telecopy (Fax)


Patrick D. Brown

